

**MARTIN & BONTRAGER, APC**  
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Attorneys for Plaintiffs  
CHARI ISRANI

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

CHARI ISRANI, Individually and  
On Behalf of All Others Similarly  
Situated,

Plaintiffs,

vs.

SECURE ONE CAPITAL  
CORPORATION,  
Defendant(s).

Case No.: 8:17-cv-00895-JVS-JCG

**STIPULATION TO DISMISS**

NOW COMES Plaintiffs, CHARI ISRANI and Defendant, SECURE ONE  
CAPITAL CORPORATION, by and through the undersigned counsel, and  
hereby jointly move this Honorable Court for a dismissal of this matter. Plaintiff  
dismisses his individual claims with prejudice and the putative class claims  
without prejudice pursuant to *Fed. R. Civ. P. 41(a)(1)(A)(ii)*. Each party to bear  
its own attorneys' fees and costs incurred.

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3 RESPECTFULLY SUBMITTED,  
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6 Dated: August 24, 2017

**MARTIN & BONTRAGER, APC**

7  
8 By: /s/ Nicholas J. Bontrager

9 Nicholas J. Bontrager  
10 *Attorney for Plaintiffs*  
11

12 Dated: August 24, 2017

**SESSIONS FISHMAN ISRAEL**

13 **NATHAN & ISRAEL**

14 By: /s/ Debbie P Kirkpatrick

15 Debbie P Kirkpatrick  
16 *Attorney for Defendant*  
17 *Secure One Capital*  
18 *Corporation*  
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**PROOF OF SERVICE**

I, Nicholas J. Bontrager, state the following:

I am employed in Los Angeles, California; I am over the age of 18 and am not a party to this action; my business address is 6464 W. Sunset Blvd., Suite 960, Los Angeles, CA 20028. On August 24, 2017, I served the following documents:

**STIPULATION TO DISMISS**

On all parties of record, through counsel  
Debbie P. Kirkpatrick,  
dkirkpatrick@sessions.legal

By the following means of service:

[X] **BY ELECTRONIC CASE FILING:** I filed the submitted the document listed above via the court's Electronic Case Filing (ECF) system which provides electronic mail (email) service of the listed document directly to the party listed above to his/her "email address of record."

[X] **STATE:** I declare under penalty of perjury under the laws of California that the above is true and correct.

Executed on August 24, 2017, at Los Angeles, California.

By: /s/ Nicholas J. Bontrager  
Nicholas J. Bontrager